

LAW OFFICES OF
GERALD B. LEFCOURT, P.C.
A PROFESSIONAL CORPORATION
148 EAST 78TH STREET
NEW YORK, NEW YORK 10075

GERALD B. LEFCOURT
lefcourt@lefcourtlaw.com

TELEPHONE
(212) 737-0400
FACSIMILE
(212) 988-6192

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SHERYL E. REICH
reich@lefcourtlaw.com
RENATO C. STABILE
stabile@lefcourtlaw.com
FAITH A. FRIEDMAN
ffriedman@lefcourtlaw.com

June 29, 2011

VIA ECF FILING

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

*In re Application of Debbie Gushlak for an Order Pursuant to 28 U.S.C. §1782
MC-11-218(NGG)*

Dear Judge Garaufis:

We write as counsel to Applicant Debbie Gushlak to object to the request made by Alan Futterfas as counsel to putative witness Yelena Furman to allow that the objections to the issuance of a subpoena pursuant to 28 U.S.C. §1782 be filed under seal. The request was made in an unfiled letter to the Court dated June 27, 2011.

Fed.R.Civ.P. 5.2(a) provides a procedure for the redaction of confidential material without either imposing significant restrictions on the parties occasioned by sealing or depriving the public of its right to know what goes on in judicial proceedings. Nothing in the documents warrants special treatment.

Thank you for your attention to this matter. Per the Court's rule with respect to non-time sensitive documents of fewer than five pages, no courtesy copy is being provided to Chambers.

Respectfully submitted,


Sheryl E. Reich